

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

Z-TEL COMMUNICATIONS, INC.	}	
	}	
Complainant	}	
	}	
vs.	}	Docket No. 02-0160
	}	
ILLINOIS BELL TELEPHONE COMPANY, d/b/a AMERITECH ILLINOIS	}	
	}	
Respondent	}	

AMERITECH ILLINOIS' REPLY BRIEF ON REHEARING  
ON THE PARITY ISSUE

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October 8, 2002

STATE OF ILLINOIS  
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Illinois Bell Telephone Company d/b/a Ameritech Illinois ("Ameritech Illinois") files this reply brief on rehearing on the parity issue in response to the briefs filed by Z-Tel Communications, Inc. ("Z-Tel") and Staff on October 4, 2002.

I. RESPONSE TO Z-TEL

A. Z-Tel continues to distort the record evidence.

As it has done throughout this proceeding, Z-Tel distorts the record evidence.<sup>1</sup> Z-Tel repeatedly and falsely claims that copies of ASON service orders are automatically delivered to several Ameritech-retail operating units each time an order is processed or changed in ASON.

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<sup>1</sup> See Ameritech Illinois' Reply Brief filed April 16, 2002, pp. 1-13, in which Ameritech Illinois documented 20 significant distortions of the record evidence by Z-Tel in its opening brief. See also Ameritech Illinois' Response to Z-Tel's Petition for Review, pp. 5-8, filed May 2, 2002, in which Ameritech Illinois documented Z-Tel's misstatement of the record regarding the information received by Ameritech's retail operations.

For example, at page 7 of its Initial Brief, Z-Tel claims:

However, the evidence in the initial phase of this proceeding shows that once an Ameritech retail representative enters a change order for one of its customers into ASON, a “mirror” copy of that data file is delivered immediately to several Ameritech-retail operating units. Tr. 375.

On page 9, Z-Tel states, “Ameritech’s retail operations are provided access to the information through the delivery of change records from ASON.”

On page 10, Z-Tel asserts, “The information in the ASON records for service orders is available to Ameritech’s retail operations through a single batch delivery of change records.”

On page 15, Z-Tel repeats:

It is crystal clear that Ameritech continues to deliver OSS information to its retail operations through a process that is not in parity with the process by which this information is made available to CLECs. Ameritech’s retail operations are provided access to the service order information in a batch delivery of change records through the ASON process.

Also, on page 15, Z-Tel again claims:

“Once an Ameritech retail representative enters a change order into ASON, a “mirror” copy of that data file is delivered immediately to several Ameritech-retail operating units. Tr. 375 (original proceeding). Because this information is delivered in a single-integrated process, Ameritech is able to use the ASON record as an additional tool in its retail systems.

None of these statements is correct. The only record support Z-Tel provides is page 375 of the initial hearing transcript. Ameritech Illinois attaches a copy of Transcript pages 375-376 as Exhibit A to this Brief. As the Administrative Law Judge and Commission will note, Transcript page 375 does not support Z-Tel’s statements. What is actually stated on Transcript page 375 is that ASON delivers a mirror copy of the service order to the Service Order Interface (“SOI”). However, the SOI is not an “Ameritech-retail operating unit.” Rather, it is a

provisioning system used to distribute both wholesale and retail service order information to other downstream systems. Z-Tel Ex. 7.1, p. 4.

The relationship of SOI to ASON and the provisioning process is described in Z-Tel Ex. 7.1:

ASON is the central distribution point for all service orders. ASON uses the Service Order Distributor (SOD) to distribute copies of the order to downstream systems involved in the fulfillment of the order, e.g., provisioning, directory, E911. One of these downstream systems, the Service Order Interface (SOI), further transmits particular portions of the service order to other downstream systems as specified by the receiving application. There are a multitude of different order types, e.g., N (new), "D" (disconnect), "C" (change), and a multitude of differences within specific order types, e.g., class of service, USOC, FID. The downstream systems to which a service order is sent depend upon the type of order and the particular information in the order. The distribution is made based upon pre-assigned codes specific to the type of order and particular information within that order.

Z-Tel Ex. 7.1, p. 2.

As Ex. 7.1 explains, delivery of a service order to SOI is not delivery to an "Ameritech-retail operating unit." Moreover, Transcript pages 375-376 explain that Ameritech retail service representatives do not have direct access to SOI:

When service representatives use the ASON system and access service orders, they are going into the ASON database. The SOI is what is known in the data world as a closed system.

\* \* \*

There is no – there is no terminal access to the SOI. Anything that is looked at – when you actually look at Ameritech service order. It is looking into the Ason database.

Tr. 375-376.

The downstream distribution of orders was further discussed in Ms.

Lawson's rebuttal testimony:

Q. Citing Ameritech Illinois' response to Interrogatory 7, Mr. Reith (page 7, line 20) also contends that when a customer migrates from

- Ameritech, the information regarding that customer's account is sent to downstream systems. Does this indicate a lack of parity?
- A. No, it does not. As the response to Interrogatory 7 describes, ASON is an order entry system at the "front end" of Ameritech's provisioning systems. When a service order is entered in ASON to migrate a customer from Ameritech retail to Z-Tel (or *vice versa*), the service order is distributed to downstream systems involved in fulfilling the order, such as network provisioning, billing, directory, 911, etc. The reason ASON distributes orders to Ameritech's downstream systems and not to Z-Tel is that Ameritech's network and systems are used to provide the telecommunications services, and Z-Tel's are not. Ameritech must send information to its systems so that they can determine what action to take to fulfill the order. Sending the information to Z-Tel would serve no purpose since Z-Tel's provisioning systems, to the extent it has any, are not involved in providing the service.

Ameritech Ill. Ex. 4.0, pp. 6-7.

In summary, Z-Tel's statement that mirror copies of ASON service orders are automatically sent to several Ameritech-retail operating units is a gross distortion of what actually happens in the provisioning process.

- B. Z-Tel's latest request for relief should not be considered by the Commission.

Z-Tel has once again changed its mind regarding the relief it seeks.

After sending the Administrative Law Judge and Ameritech Illinois off on a wild goose chase by requesting in its rehearing testimony that the Commission unilaterally modify the industry standard 836 LLN, Z-Tel now totally abandons that position. In its place, it conjures up a new request. It is grossly unfair and a fundamental violation of due process to raise an issue for the first time in a brief after the close of the record. Everything Ameritech Illinois stated in its Initial Brief regarding the Commission's lack of jurisdiction on due process and statutory

grounds to entertain Z-Tel's request, and the lack of a legal or factual basis to support Z-Tel's request, applies with equal force to Z-Tel's Initial Brief.

Ameritech Illinois incorporates by reference its Initial Brief in response to Z-Tel's initial Brief.<sup>2</sup>

Furthermore, the Administrative Law Judge specifically ruled, "the scope of this rehearing is to determine what is required in order to achieve parity in line loss information." Tr. 424. The Administrative Law Judge later clarified that line loss information included any information on "disconnected customers." Tr. 432. Ms. Lawson testified and the evidence is undisputed that "Ameritech's retail business units currently receive their line loss notifications exclusively through the 836 LLN, the same process used to provide line loss notifications to Z-Tel and other CLECs." Ameritech Ill. Ex. 4.0, p. 5.

Z-Tel's latest request directly violates the Administrative Law Judge's ruling regarding the scope of this rehearing. Z-Tel's request is in no way limited to line loss information or information about disconnected customers but addresses the universe of all service orders in ASON. Based upon the Administrative Law Judge's prior ruling, pursuant to which this rehearing was conducted, the Commission should not consider Z-Tel's latest demand.

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<sup>2</sup> At page 5 of its Initial Brief on Rehearing, Z-Tel states, "Z-Tel has requested since its initial brief [in the original proceeding] the ability to retrieve ASON records through a batch process." This statement is itself untrue, since Z-Tel's Initial Brief on Rehearing is the first time it has ever requested receipt of ASON information "through a batch process." The statement nevertheless constitutes a judicial admission by Z-Tel that the issue was not raised or considered in the original evidentiary record. Nor was the issue raised in an application for rehearing filed with the Commission. Therefore, Z-Tel's new request, like those before it, is beyond the scope of the Commission's jurisdiction in this rehearing proceeding.

C. Z-Tel has abandoned a frivolous position in favor of an even more frivolous position.

While Z-Tel continues to surprise with the absurdity of its positions, it has outdone itself this time. Z-Tel requests that:

the Commission compel Ameritech to develop the necessary Application-to-Application software systems that will allow CLECs to retrieve ASON-generated service order records through Verigate.<sup>3</sup>

(Z-Tel Initial Br. at 2).

Z-Tel explains:

On cross-examination, Ameritech witness Lawson indicated that Ameritech does indeed permit CLECs to retrieve data from the ASON database, through the Verigate processes that are available to CLECs. Tr. 491. However, in order for CLECs to retrieve this information in the same way that ASON records are delivered to Ameritech's retail operations, someone would have to develop "application to application" software to retrieve ASON records in a batch basis. Tr. 491.

(Z-Tel Initial Br. at 5).

Z-Tel explains that by batch process it means:

"being able to download, in a single process, all of Z-Tel's customer service records for a day, rather than viewing and having to download each customer record separately.

(*Id.*).

Z-Tel acknowledges that:

Z-Tel would agree that making these records available to retrieve, for purposes of this case, is the same as having those records delivered.

(*Id.*, Fn 2).

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<sup>3</sup> Verigate is a Web-based system that allows CLECs to access information over the Internet. An application-to-application interface is a direct electronic interface between two companies' systems. The two types of systems are distinct. Therefore, Z-Tel's request, as stated, makes no sense.

What is remarkable about Z-Tel's latest position is that the evidence, including the evidence that Z-Tel introduced, establishes that Z-Tel already utilizes an application-to-application interface by which it may retrieve all service orders related to its accounts on a daily basis. Z-Tel's Director of Industry Policy Michael Reith introduced Z-Tel Ex. 7.1 as part of his testimony. Z-Tel Ex. 7.1 is a copy of Ameritech Illinois' Second Supplemental Response to Z-Tel's Fourth Set of Discovery Requests served on Z-Tel (with a copy to the ALJ) on September 6, 2002. Page 3 of Z-Tel Ex. 7.1 contains the following statement:

ASON service orders related to Ameritech retail customer accounts may be viewed in ASON by Ameritech retail service representatives. Similarly, Z-Tel may view ASON service orders related to Z-Tel customer accounts on a dial-up basis using the GUI (graphical user interface) based enhanced Verigate pre-order inquiry system (order status inquiry) **or through an EDI or CORBA application to application interface. Using EDI/CORBA, Z-Tel can download service order files and store and format the data for its own internal purposes.** (emphasis supplied).

This statement clearly discloses the existence and availability to Z-Tel, not only of the Verigate Web-based interface which allows Z-Tel to view and copy individual service orders, but also of the EDI and CORBA application-to-application interfaces that allow Z-Tel to download service order information and use it in any way Z-Tel sees fit.<sup>4</sup>

Ms. Lawson explained the application-to-application interfaces available to Z-Tel in more detail in her rebuttal testimony:

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<sup>4</sup> Z-Tel states in its Initial Brief at page 11 that "Ameritech disclosed in rebuttal (for the first time) that in fact the ASON data is available to Z-Tel through the Verigate System interface." That statement is, of course, false. The Verigate system, as well as the EDI/CORBA application-to-application interfaces, were discussed in the September 6 discovery responses and were known to Z-Tel before it filed its response testimony on September 16, 2002. Furthermore, Z-Tel already uses both the Verigate Web-based interface and the CORBA application-to-application interface in its business operations. Ameritech Ill. Ex. 4.0, pp. 6-7. Therefore, Z-Tel necessarily has been aware of these interfaces for some time.

Yes, I have already described the Verigate system that allows Z-Tel to view (and copy) ASON orders. **In addition, using the Order Status Inquiry function of either an EDI or CORBA application-to-application interface, Z-Tel could download every service order related to Z-Tel accounts and store, format and use the information in any way it saw fit. I understand that Z-Tel uses the CORBA interface.**

Ameritech Ill. Ex. 4.0, p. 7 (emphasis supplied).

Ms. Lawson provided further information on the Verigate GUI and EDI/CORBA application-to-application interfaces during cross-examination by Z-Tel's attorney:

Q. Now, Ms. Lawson, you indicate that all of the information that Z-Tel is requesting in Mr. Reith's testimony is already included in the Verigate systems, or through the Verigate systems; is that true?

A. Yes, they are on the service order, which is the service order inquiry. So all the information is already included in the service order, and the service order is available through the preordering interfaces of Verigate **and also EDI Corbut. [sic]**<sup>5</sup> **So there is three different interfaces.**

\* \* \*

Q. And how would I search and find a service for a particular customers?

A. There is different ways. \* \* \* **Also with the application to application EDI and Corbut,[sic] you could program on your side of the interface because that's what an application to application provides the flexibility for the CLEC's and you could get copies of all your service orders on a daily basis. And you could put them in a database for any of the fields of information on the service order that you felt based on your business needs that you needed and wanted to track and utilize.**

Q. If I wanted to view the information, I would go to a particular service order and pull up on the screen, on the computer screen, the service order information associated with a particular customer?

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<sup>5</sup> All of the transcript references to "Corbut" should be corrected to read "CORBA."

- A. **If you were using a GUI. If you were using the app to app, you could program however you wanted it to. You could basically say I want a screen that says I want to look at this field of information on the service order for any service order activity, like for any D order, I want to look at these specific fields. And with your application to application you could prepare any type of ad hoc reporting that you wanted to do, any sorting, any tracking. So what Verigate does is it gives you the screens that we design working with the CLEC's on how you wanted to view it. What an application to application does it gives you the flexibility to program any way anyway, because there could be different needs of a CLEC. So it allows you that flexibility.**

Tr. 499-502 (emphasis supplied).

Ms. Lawson again explained the difference between Verigate and CORBA during cross-examination by Staff:

- Q. I believe in your cross testimony here you testified that you could insert a company code and get a list of service orders, do you recall that?

A. Yes, sir.

- Q. Could that be a list of only disconnect service orders or does it have to be all service orders?

A. By the company code when you put that in there it gives a list of all the service orders. **In your Corbut [sic] application to application, what you could program is when I get that list of service orders then I want to do a sort and give me only the list of disconnect service orders. And then I want you to pull the detail for each of those disconnect service orders. So the capability exists in the application to application.** In Verigate you put pull it up by the list and then you indicate which service orders you want to view and you can only click on and view the disconnect service orders if you desire.

- Q. When you say the capability exists, you mean that the CLEC's would have to develop some program or are you saying the capability exists in Verigate?

A. The capability does not exist in Verigate. **The capability exists in application to application, because what application to**

**application interface is, it provides the flexibility for the CLEC's to program whatever business needs they have and how they want to receive the data based on how they want to do business.**

Tr. 520-522 (emphasis supplied).

It defies credulity that Z-Tel's attorney and representatives at the hearing did not understand the distinction Ms. Lawson was making between the Verigate Web-based system, which allows Z-Tel to individually view and copy service orders in ASON, and the EDI and CORBA application-to-application interfaces, which allow Z-Tel to download on a daily basis (what Z-Tel calls a batch process) all service orders related to Z-Tel accounts and use them in any way Z-Tel sees fit. Z-Tel already uses both the Verigate Web-based and the CORBA application-to-application interfaces and knows full well that it already has-- through the CORBA application-to-application interface-- the capability it is now requesting. Z-Tel is desperately attempting to fabricate an issue—any issue at all—to camouflage the fact that it has no agenda in this rehearing proceeding other than to perpetuate conflict and controversy.

D. Z-Tel's arguments for discontinuing the Local Loss Report are unpersuasive.

In its Initial Brief, Z-Tel finally addresses the sole parity issue that is properly before the Commission on rehearing--whether the requirement to provide the Local Loss Report ("LLR") should be eliminated. Z-Tel opposes eliminating the LLR on the ground that the extra information it contains is "useful to CLECs in managing their operations." (Z-Tel Initial Br. at 4.) Z-Tel's only

support for its position is Ms. Lawson's direct testimony that as of July 23, 2002, 25 CLECs have viewed the LLR and four have requested to receive it via email. (Z-Tel Initial Br. at 13).

The fact that 25 CLECs may have viewed the LLR on the Website on at least one occasion and that four requested to receive it via email indicates curiosity, but it is not probative evidence that the LLR provides useful information or that any CLEC actually uses it in its business operations. The only probative evidence on this point is Z-Tel's testimony that it finds the LLR to be of no value and does not use it. Z-Tel Ex. 7.0, p. 6.

Ms. Lawson's testimony that the LLR is not used or useful to the CLECs remains undisputed on the record, and the Commission should ignore Z-Tel's belated opposition to eliminating the report.

## II. RESPONSE TO STAFF.

Staff opposes elimination of the LLR. Staff appears to have two rationales. First, Staff suggests the Commission imposed the requirement as a remedy for Ameritech Illinois' past failure to provide this information to Z-Tel while it was providing it to its own retail operations. (Staff Initial Br. at 5). Second, Staff suggests the Commission imposed the requirement to offset the fact that Ameritech retail does not rely upon the 836 LLN to discontinue billing. (Staff Initial Br. at 4-5).

The Commission's Order does not support either of Staff's interpretations. The Commission required Ameritech to provide the LLR because it thought it

would be useful to Z-Tel and because at that time it was necessary to achieve parity. However, as Z-Tel has admitted, it is not useful to Z-Tel. Z-Tel Ex. 7.0, p. 6. Moreover, because Ameritech Illinois' retail operations now use the 836 LLN exclusively, there is no longer any requirement to continue the LLR to achieve parity.

### III. CONCLUSION

Ameritech Illinois' Application for Rehearing presented only one issue with respect to parity—whether the requirement to provide the Local Loss Report should be eliminated. That is the only issue properly before this Commission in this rehearing proceeding. The evidence is undisputed that the LLR is not used or useful to the CLECs. Z-Tel admits that it does not use it. Ameritech Illinois' request to eliminate the requirement to provide the report should be granted.

Z-Tel did not file an Application for Rehearing. Therefore, its ever-changing demands for relief are not before the Commission and may not be granted. Z-Tel has constantly distorted the record evidence, thereby prolonging this proceeding and creating unnecessary work for the parties, the Administrative Law Judge and the Commission. Z-Tel has failed to establish any legal basis for any of its various demands. None of them is supported by the Record evidence. While Z-Tel will undoubtedly think of something new to demand in its Reply Brief, the Commission should treat that demand like all of Z-Tel's former demands; it should ignore it as being beyond the scope of Z-Tel's complaint and the record

evidence, beyond the scope of this rehearing proceeding and unsupported in law or fact.

Respectfully submitted,  
Ameritech Illinois

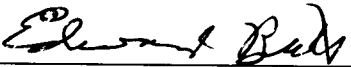
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Notice of Filing and Certificate of Service

The undersigned, an attorney, certifies that Ameritech Illinois' Reply Brief on Rehearing on the Parity Issue was filed with Donna Caton, Chief Clerk of the Illinois Commerce Commission, by e-docket and copies were served on each person on the attached Service List by electronic mail on October 8, 2002.

  
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Service List Docket 02-0160

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EXHIBIT A

Transcript of Proceedings  
March 26, 2002

(Pages 375-376)

1 JUDGE HAYNES: We'll come back at 2. We'll break  
2 till 2.

3 (Whereupon, a luncheon break was  
4 taken at 1 o'clock p.m., to  
5 resume at 2 o'clock p.m.)

6 Go ahead.

7 REDIRECT EXAMINATION

8 BY

9 MR. BUTTS:

10 Q. Mr. Sirles, before the break, you were asked a  
11 series of questions about the SOI database, and who  
12 has access to the SOI database, and how the access is  
13 obtained. Just to make the record clear on that  
14 point, would you describe that process?

15 A. Yes. The SOI database is actually a mirror of  
16 the database that exist in the ASON system. ASON  
17 actually has its own database.

18 When service representatives use the ASON  
19 system and access service order, they are going into  
20 the ASON database. The SOI is what is known in the  
21 data world as a closed system. The only way that you  
22 can get information out of SOI is by writing

1 customized reports that you asked the SOI to produce.  
2 The information's either furnished in a report format  
3 or furnished as feed to other systems.

4                   There is no -- there is no terminal  
5 access to the SOI. Anything that is looked at --  
6 when you actually look at Ameritech service order. It  
7 is looking into the Ason database.

8       MR. BUTTS: Thank you. Nothing further.

9       MR. KELLY: I have a follow-up question.

10      JUDGE HAYNES: Recross?

11                   RECROSS EXAMINATION

12                   BY

13                   MR. KELLY:

14      Q. You indicated that the SOI is not -- not a  
15 real-time or database. It's a feed. It's a data feed  
16 from ASON?

17      A. It's fed by ASON.

18      Q. Is it a real-time database, meaning if someone  
19 enters a key stroke in ASON, does that automatically  
20 feed that key stroke of information to the SOI?

21      A. No.

22      Q. Once the database is -- once an interior